

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Global Brokerage, Inc. f/k/a FXCM Inc.  
Securities Litigation

Master File No. 1:17-cv-00916-RA-BCM

CLASS ACTION

This Document Relates To: All Actions

**NOTICE OF MOTION FOR ENTRY OF ORDER PRELIMINARILY  
APPROVING SETTLEMENT AND ESTABLISHING NOTICE PROCEDURES**

PLEASE TAKE NOTICE that Shipco Transport Inc. (“Shipco”) and E-Global Trade and Finance Group, Inc. (“E-Global” and with Shipco, “Plaintiffs”), individually and on behalf of all others similarly situated, will hereby move this Court on a date and at such time as may be designated by the Honorable Ronnie Abrams, United States District Judge of the United States District Court for the Southern District of New York, 40 Foley Square, New York, NY 10007, Courtroom 1506, New York, NY 10007, for entry of an Order: (1) preliminarily approving the terms of the Settlement as set forth in the Stipulation of Settlement (“Stipulation”), filed concurrently herewith; (2) approving the form and method for providing notice of the Settlement; and (3) scheduling a Settlement Hearing and deadlines for mailing and publication of the Notice, the filing of Settlement Class Member objections, the filing of Settlement Class Member opt-out notices, the filing of Plaintiffs’ motion for Final Approval of the Settlement, and the filing of Class Counsel’s application for attorneys’ fees and expenses.

This motion is based on this Notice of Motion, the Stipulation and all exhibits attached thereto, Plaintiffs’ supporting Memorandum of Law, all filed contemporaneously herewith, and all pleadings, records, and papers on file herein.

Plaintiffs request that the Court enter the [Proposed] Order Granting Plaintiffs' Motion for Preliminary Approval of Class Action Settlement, attached as Exhibit A to the Stipulation, and submitted concurrently herewith.

Dated: February 3, 2023

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

By: /s/Phillip Kim  
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*Additional Counsel*

**CERTIFICATE OF SERVICE**

I hereby certify that on February 3, 2023, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

By: /s/Phillip Kim